

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	15 CR 72-37
KASH LEE KELLY,)	Judge Philip P. Simon
)	
)	
Defendant.)	

**KASH KELLY'S MOTION TO
CONTINUE SENTENCING**

NOW COMES Defendant, KASH LEE KELLY, through his attorney, JOSHUA B. ADAMS, and respectfully moves this honorable court to continue the sentencing currently set for August , 2020. In support of his motion Mr. Kelly states the following.

1. Sentencing is currently set for August 31, 2020.
2. Counsel has been diligently preparing for sentencing and as such, has been reviewing the voluminous discovery tendered by the government.
3. Additionally, counsel anticipates a protracted sentencing hearing where Mr. Kelly will raise objections to enhancements contained in the PSI. Counsel has met with Mr. Kelly and discussed these enhancements and the legal objections to their applicability.
4. Moreover, counsel intends to present extensive mitigation on behalf of Mr. Kelly at sentencing and is in the process of drafting a comprehensive sentencing memorandum focusing on the §3553(a) factors.

5. Mr. Kelly continues to gather letters of support in mitigation ahead of his sentencing.
6. Additionally, because of the COVID-19 pandemic, counsel and Mr. Kelly have not been able to meet.
7. Therefore, counsel respectfully requests a continuance until early January 2021 for Mr. Kelly's sentencing hearing.

Respectfully submitted,

/s/Joshua B. Adams
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